



Consulting • Engineering • Remediation

September 28, 1999

US EPA RECORDS CENTER REGION 5



513898

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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Regional Administrator
United States Environmental
Protection Agency, Region 5
ATTN: Darryl Owens
Mail Code SR-6J
77 West Jackson
Chicago, Illinois 60604

Director, Solid and Hazardous
Waste Division
Minnesota Pollution Control Agency
ATTN: Site Response Section
520 Lafayette Road North
St. Paul, Minnesota 55155

President
Reilly Industries, Inc.
300 North Meridian Street, Suite 1500
Indianapolis, Indiana 46204-1763

Re: United States of America, et al. vs. Reilly Tar & Chemical Corporation, et al.

File No. Civ. 4-80-469

CD-RAP Section 9

Gentlemen:

In accordance with Sections 9.2.4 and 9.7.2 of the Remedial Action Plan for the referenced case, the City of St. Louis Park is submitting cessation criteria for the Drift Aquifer gradient control well W422 and the Platteville Aquifer gradient control well W434. Upon approval by the Agencies, the City expects to submit a request to cease pumping at both of these wells based on the criteria proposed in this letter.

WELL W422

Well W422 was constructed in the Drift Aquifer in 1988 and has pumped at an average rate at approximately 50 gallons per minute. In recent years, the water quality in samples from well W422 has improved from approximately 80 parts per billion total PAH to less than 10 parts per billion total PAH. The cessation criteria proposed for this well by the City are based on the Minnesota Department of Health Health Risk Limits (HRL) for six non-carcinogenic PAH compounds and USEPA Maximum Contaminant Level (MCL) for benzo(a)pyrene. The proposed cessation criteria are shown in the attached table.

The City believes the proposed criteria are appropriate because they are based on current scientific knowledge regarding the health effects of specific PAH compounds. The HRLs and MCL are drinking water criteria, yet the Drift and Platteville Aquifers in St. Louis Park are not used for drinking water purposes. The current water quality in well W422 is below the



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Director, Solid and Hazardous Waste Division
President
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proposed cessation criteria.

WELL W434

Well W434 was constructed in the Platteville Aquifer in 1997 and has pumped at an average rate of approximately 30 gallons per minute. The water quality in samples from well W434 has remained constant during the last two years. As shown on the attached table, the City proposes cessation criteria for well W434 identical to that for well W422. The rationale for the cessation criteria for well W434 is the same as the rationale for well W422.

Please review the proposed cessation criteria in accordance with Part G of the Consent Decree as required by the CD-RAP.

Any questions concerning this letter may be directed to this office.

Sincerely,

A handwritten signature in blue ink that reads "William M. Gregg".

William M. Gregg
Project Leader for the
City of St. Louis Park

cc: Mike Rardin
Scott Anderson

PROPOSED CESSATION CRITERIA FOR WELLS W422 AND W434

Compound	EPA MCL ¹ (ppb)	MDH HRLs ² (ppb)	Proposed Cessation Criteria (ppb)
cPAH:			
benzo(a)pyrene	0.2	-	0.2
Other PAH:			
Acenaphthene	-	400	400
Anthracene	-	2,000	2,000
Fluoranthene	-	300	300
Fluorene	-	300	300
Naphthalene	-	300	300
Pyrene	-	200	200

¹ Benzo(a)pyrene is the only carcinogenic PAH listed by the EPA and MDH to have a MCL. The MCL for Benzo(a)pyrene is 0.2 ppb.

² Based on MDH HRLs, these six compounds, listed above, are the only "Other PAH" listed by the MDH's HRLs for groundwater. The only EPA reference for Other PAH is 400 ppb Health Advisory for naphthalene.